

INTERNATIONAL MULTIFOODS  
MULTIFOODS TOWER  
BOX 2942  
MINNEAPOLIS, MINNESOTA 55402



29603

June 20, 1988

Mr. Edward Kowalski, 5HR-11  
U.S. EPA - REGION 5  
Office of Regional Counsel  
230 South Dearborn Street  
Chicago, IL 60604



RE: NINTH AVENUE DUMP, GARY, INDIANA  
U.S. SCRAP, CHICAGO, ILLINOIS

Dear Mr. Kowalski:

As you may recall, I had a telephone conversation with you on or about June 16 regarding the above referenced sites. You stated that you would review the evidence which your office has gathered in light of Steve Martell's statement to determine whether some of the potentially responsible parties on your list would be removed from said list. We reviewed briefly the alleged link between International Multifoods and the sites. As I explained to you at that time, my internal investigation has uncovered no documentation which falls within the scope of your original information request. A response to that information request, dated April 5, 1988, was directed to Ms. Susan Swales of your office.

I attended the PRP meeting in Chicago on June 9, 1988. I viewed the abstract listing PRP's alphabetically, and also viewed that limited portion of Martell's statement allegedly linking Multifoods to the sites. I also had a brief glimpse at Ms. Swales' printout, which indicated one invoice dated April 18, 1975. In a later telephone conversation with Ms. Swales, she indicated that no actual copy of said invoice apparently exists in your records. I have been unsuccessful in locating such an invoice in our company records, primarily due to the age of this transaction. We are, therefore, presented with Mr. Martell's statement, which is of very dubious accuracy, to the effect that certain "coconut oil waste" was dumped in some undetermined quantity during the time period which your office is concerned with, namely 1972-1975.

As you and I also discussed during our recent telephone conversation, there may have been a disposal of a dilute solution derived from shredded coconut, with some coconut oil mixed in. The solution in question was the by-product of a process to isolate coconut fiber, which was used for the manufacturing of a fig-paste substitute for human consumption. The liquid which was the by-product of this process was originally intended to be hauled away to be used in the manufacture of soap. When it was later determined that there was too much water in the solution for it to be cost effective in the soap manufacturing process, our location then engaged the services of a contract hauler to remove the solution generated by the process. Such a mixture, even

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if not used as a soap stock, as it was intended to be, would have been quickly degraded by the micro-organisms in the environment, into water and carbon dioxide. In addition, it was discovered that washed wheat bran was just as functional but far less costly. Accordingly, the aforementioned process was then accomplished using the bran, instead of coconut, as a key ingredient.

I am providing this information, as you suggested during our conversation, to aid you in your decision as to whether International Multifoods should be removed from the list of potentially responsible parties with regard to the above referenced sites. A dilute solution from the aforementioned process is not a hazardous substance and is biodegradable. I trust that I will receive your letter removing International Multifoods from the list of potentially responsible parties with regard to the above referenced sites, prior to the issuance of any special notice letter, which you stated was scheduled for the first week of July, 1988. I look forward to receiving that letter.

Very truly yours,

INTERNATIONAL MULTIFOODS

  
David L. Soucy  
Manager, Corporate Safety & Loss Prevention

DLS/cst

*HILTON SMITH*

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1. ☐ Show to whom delivered, date, and addressee's address. ☐ Restricted Delivery ☐ (Extra charge)†

3. Article Addressed to:  
 INTERNATIONAL MULTI FOODS  
 PO BOX 2942  
 MINNEAPOLIS, MN 55402

4. Article Number  
 6680167858

Service:  
☐ Insured  
☐ COD  
☐ Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Addressee  
*X* *[Signature]*

6. Signature — Agent  
*X*

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)  
 29604 JET  
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3. Article Addressed to:  
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 PO BOX 2942  
 MINNEAPOLIS, MN 55402

4. Article Number  
 P 759 199 497

Type of Service:  
☐ Registered ☐ Insured  
☐ Certified ☐ COD  
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5. Signature — Addressee  
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6. Signature — Agent  
*X* *[Signature]*

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